DEPARTMENT OF PESTICIDE REGULATION
FUNCTIONAL OPERATION PLAN
2005/2006

Pesticide Registration

Pesticide registration is the scientific, legal, and administrative evaluation process of a pesticide product before it can be sold or used in California. The registration process also includes special registration activities such as reviewing and issuing research authorizations, reviewing and issuing emergency exemption Section 18 products, reviewing and registering structural pest control devices; and consulting with the U.S. Environmental Protection Agency on federal registration issues.

Performance Goal 1: Process 6,000 actions on submissions.

1. Reach a registration decision on approximately 10 new active ingredients (depending on the number of new active ingredients received) within an average of one year of submission of a complete evaluation package
2. Reach a registration decision on products containing currently registered active ingredients within an average of six months of submission of a complete package.
3. Evaluate 20 Section 18 requests.
4. Evaluate 550 research authorizations.
5. Evaluate 20 Special Local Needs.

Performance Goal 2: Complete the license renewal of 8,000 to 10,000 Pesticide Products by February 1, 2005.

Performance Goal 3: Reduce workload and increase efficiency.

1. Complete rulemaking process by December 31, 2005 to reduce workload in the Plant Physiology, Pest and Disease Protection, and Microbiology Evaluation Stations by reducing products requiring evaluation of efficacy data.
2. Conduct DPR-sponsored conference for the regulated community on the requirements to register a pesticide product in California by July, 2006.
3. Conduct DPR-sponsored workshop for growers on the requirements for use under Section 18 of FIFRA (emergency exemptions).

Performance Goal 4: Continue to develop workshare with USEPA.

Risk Assessment

Risk assessment is a process designed to answer questions about a chemical's toxicity, what exposure results from its various uses, what the probability is that it will cause harm, and how to characterize the risk. Risk assessment can be broken down into four steps: (1) hazard identification; (2) dose-response assessment; (3) exposure assessment; and (4) risk characterization. The Department of Pesticide Regulation (DPR) takes a comprehensive approach to risk assessment and assesses potential dietary, workplace, residential, school and residential area, and ambient air exposures. Risk assessment is often the driving force behind new regulations and other use restrictions.

Risk assessment also includes special toxicology review activities, such as reviewing emergency determinations of potential human impacts resulting from illegal residues of pesticides on agricultural commodities, and coordinating Proposition 65 activities with the Office of Environmental Health Hazard Assessment.

1. Complete six risk assessments under SB950, AB2161 or AB1807 during the fiscal year 2005-06.
2. Developed modified risk assessment prioritization and initiation process for comprehensive risk assessments.

Licensing and Certification

Licensing and Certification (L&C) is DPR's process of ensuring that persons selling, possessing, storing, handling, applying, and recommending the use of pesticides are knowledgeable in their safe use. DPR examines and licenses commercial pest control applicators, aerial applicators, pest control dealer designated agents, and pest control advisers; and certifies pesticide applicators that use or supervise the use of restricted pesticides. Such licenses and certificates cannot be renewed unless the holder has completed certain minimum continuing education hours related to pesticides or pest management within each two-year license or certificate period. L&C also licenses pest control businesses, maintenance gardener pest control businesses, pesticide brokers, and pest control dealers.

Performance Goal: Administer the Licensing and Certification Program.

1. Process about 8,500 license and certificate applications by December 2005.
2. Administer 2,500 exams.
3. Notice the amendment to the licensing regulation that addresses continuing education renewal options for certified applicators by December 2005.
4. Accredit about 900 continuing education courses and audit about 6 courses.
5. Implement revised Private Applicator Certification exam by September.
6. Implement the revised Laws and Regulations exam by December 2005.
7. Release the new Landscape Maintenance Pest Control study guide for the qualified applicator landscape maintenance category by January 1, 2006.
8. Implement the new Maintenance Gardener Pest Control Category study guide and exam question pool.
9. During the next six months, the system requirements specifications (SRS) will be completed; the vendor software will be evaluated; and procurement for the Licensing and Certification Data Migration Project will be completed.

Permitting and Pesticide Use Reporting

Permitting is an ongoing program to assess, evaluate, and mitigate the use of restricted materials (California Environmental Quality Act equivalency). Pesticide use reporting is an ongoing program to collect and process data on full use reporting of agricultural and structural pesticide applications, per the Food Safety Act of 1989 (Chapter 1200,

Assembly Bill 2161). Under full use reporting, certain agricultural pesticide uses are required to be reported to the county agricultural commissioner, who, in turn, reports the data to DPR. DPR also collects reports from structural pest control businesses and pesticide use in schools. Full use reports include the amount and name of the pesticide applied, date and location (section, township, range) of the application, and the crop, if the application was agricultural. The primary exceptions to the use reporting requirements are home and garden use and most industrial and institutional use. The pesticide use reports are compiled by DPR and made available on disc and on the Web. DPR also provides support to the county agricultural commissioners on their administration of the computer systems and applications for the Restricted Material Permit Program, which is used to manage, track, and collect data for permits, operator IDs, and pesticide use reports.

Performance Goal: Administer the statewide permitting and pesticide use reporting programs.

1. Publish the 2004 Annual Pesticide Use Report by December 2005, including major categories.
2. Redesign and deploy the School PUR database to process 2002 – 2005 data.
3. Compile and distribute a list of additional commodities and codes requested by county agricultural commissioners for the 2006 permit/PUR program (late 2005).
4. Support the ongoing development and implementation of standards and procedures for centralized storage of GIS Field Border Database shapefiles in DPR's GIS Library. Assist Tulare and San Benito counties in implementing the statewide Geographical Information System (GIS) and field border data development.
5. Support the ongoing administration of the restricted material permit and pesticide use reporting computer systems.

Monitoring/Surveillance (Continuous Evaluation)

Monitoring/surveillance is an ongoing process to determine the fate of pesticides, protecting the public and the environment from pesticide contamination through analyzing hazards, and developing pollution prevention strategies. Monitoring/ surveillance program activities include ground water monitoring, surface water monitoring, air quality monitoring, pesticide illness surveillance, produce surveillance, and special monitoring programs such as pest management and eradication, environmental fate and human exposure monitoring projects. The monitoring of pesticide residues in food is also a major component of the monitoring/surveillance activities.

Performance Goal 1: Monitor Pesticide Residues in Food.

1. State Residue Monitoring: collect 3800 samples.
2. Pesticide Data Program: collect 2500 samples.
3. Microbiological Data Program: collect 840 samples.
4. Compile 2005 Annual Residue Summary: post to web by June 2006.

Performance Goal 2: Evaluate Pesticides in Air.

1. Update inventory of volatile organic compound (VOC) emissions from pesticides.
2. Evaluate data and information requested for reevaluations and registration requirements [multiple pesticides].
3. Evaluate 21 – 27 pesticides and other environmental contaminants in the rural, farming community of Parlier.
4. Monitor 5 pesticides as potential air contaminants (methidathion, sulfuryl fluoride, chloropicrin, iodomethane, dazomet).

Performance Goal 3: Evaluate Pesticides in Groundwater.

1. Evaluate and investigate the potential for pesticides (eptam & new active ingredients) to contaminate California's ground water and investigate further contamination of 6800(a) listed pesticides (atrazine, simazine, bromacil, diuron, prometon, bentazon and norflurazon).
2. Evaluate LEACM model for use of determining pesticide fate in California and compare accuracy to other models using field data.
3. Develop GIS layer information and apply them to investigate further contamination of detected pesticides on the 6800(a) list (atrazine, simazine, bromacil, diuron, prometon, bentazon and norflurazon).
4. Produce annual Well Inventory Report: Pesticide Contamination Prevention Act.

Performance Goal 4: Evaluate Pesticides in Surface Water.

1. Evaluate 25 pesticides as potential environmental contaminants. (esfenvalerate, permethrin, bifenthrin, cyfluthrin, cypermethrin, lambda-cyhalothrin, azinphos-methyl, chlorpyrifos, diazinon, DDVP, disulfoton, ethoprop, fenamidophos, fonofos, dimethoate, methidathion, malathion, methyl parathion, phosmet, phorate, prophenofos, tribufos, simazine, diuron).
2. Evaluate various factors that influence pesticide loading in the Sacramento River Watersheds.
3. Produce annual update of the surface water database
4. Produce GIS and mathematical models for vulnerable areas to runoff and mitigation assessment

Performance Goal 5: Evaluate Human Exposures to Pesticides.

1. Occupational Exposures:
    a. Initiate two new worker exposure observation studies in FY 2005/06.
    b. Complete the irrigator and scout observation study reports by March 2006.
    c. Complete the scientific evaluation of phosphine-generating compounds by December 2005. Follow-up on recommendations made in the phosphine evaluation report.

d. By January 2006, assist U.S. EPA Headquarters and Region 9 to initiate a project to survey farm workers to determine the information they want on pesticides, how it should be delivered and what type of training is effective.

2. Pesticide Illness Surveillance Program (PISP):
   a. Complete 1,200-pesticide episode case reviews and evaluations in FY 2005/06, and prepare the 2004 annual report of pesticide-related illnesses and injuries by February 2006.
   b. Initiate a trends analysis on field worker illnesses in FY 2005/06. Conduct an analysis of two time frames, 1984-1988 and 1999-2003, to compare whether regulatory changes impacted field worker safety.
   c. Initiate a trends analysis of the PISP database for the last 5-10 years.
   d. Provide consultation to 100 stakeholders on pesticide-related health and exposure inquiries.
   e. Through the U.S. EPA Border 2012 Project assist the Mexico's health department set up a pesticide illness surveillance program.

Mitigation of Human Health Risks

Mitigation of human health risks involve developing mitigation strategies and proposals based on scientific data for pesticides that have unacceptable risks to humans associated with exposure. These may include unacceptable pesticide exposure in air, the workplace, and in food and water. Mitigation measures may include developing proposed label changes, regulations (includes rulemaking process), and placing conditions on registration. As part of the mitigation development process, efforts are placed on obtaining and providing input on mitigation proposals from both internal and external stakeholders, responding to their comments, conducting a peer review of mitigation documents, and finalizing documents for release to the public.

Performance Goal 1: Implement Mitigation Measures for Specific Pesticides.

1. Identify and evaluate mitigation options for 2 pesticides adversely affecting the environment (MITC; 1,3-D). Collaborate with U.S. EPA on the development of a mitigation strategy for metam-sodium/MITC.
2. Complete two pesticide data evaluations of monitoring studies conducted to assess mitigation.
3. Initiate the development of mitigation strategies for amitraz, atrazine, deltamethrin and trahalomethrin, and methyl parathion; and continue development of a mitigation strategy for naled;
4. In coordination with U.S. EPA, monitor and evaluate the federal registration decision to determine whether mitigation measures are needed for azinphos-methyl (AZM). Complete the following: (1) track the progress of U.S. EPA to terminate the AZM uses on nectarines and peaches as requested by the registrants as well as their revaluation of the uses on apples, pears and other

crops; (2) by January 2006, evaluate the progress of U.S.EPA to eliminate unacceptable uses and initiate the development of appropriate mitigation measures for remaining uses that pose an unacceptable risk; and (3) coordinate the development of mitigation measures with U.S.EPA.

Performance Goal 2: Worker Risk.

1. Complete the development of one rulemaking action (Notification/Hazard Communication/Early Entry).
2. Consult with U.S. EPA Headquarters and Region 9 on WPS equivalency. Develop and submit equivalency request to U.S. EPA Region 9 and publish this regulatory package for public comment in December 2005.
3. Participate in 30 outreach sessions with health professionals, worker advocates, commodity groups and government agencies to address worker protection and public health issues.
4. Provide training on personal protective equipment and industrial hygiene principles to 300 stakeholders.
5. Provide training to 100 emergency responders on handling pesticide-related incidents. We expect to provide expertise for two training sessions.
6. Evaluate the need to develop a new PSIS leaflet that would provide information on hazards and symptoms of pesticide exposure to fieldworkers. Review current PSIS leaflets, training requirements for fieldworkers, outreach materials, and other sources of information and make a recommendation or submit a draft leaflet to management by June 2006.
7. In coordination with CACASA and Department of Industrial Relations (DIR), prepare recommendations to management on revising the existing CACASA/DPR/DIR memorandum of understanding. Develop an implementation plan as required in the CAC/DPR/DIR memorandum of understanding in coordination with DIR and county agricultural commissioners. The implementation plan will address general agency coordination, information exchange, and investigations related to pesticide use. (Note: this project is dependent upon DIR resources).
8. Work with the community clinics in San Diego County to provide outreach about pesticide illness reporting. Coordinate these outreach efforts with OEHHA and University of California, Davis.
9. Develop wallet-sized cards to help both employees and employers interpret personal protective equipment (PPE) statements and codes on labels.
10. Continue working with OEHHA and pilot counties (Fresno, Monterey, San Diego) in developing a web-based physician reporting system.
11. Support efforts to develop a “Train-the-Trainer” program in Baja California for fieldworkers who work in California.

Performance Goal 3: Mitigating Community Risk.

1. Promote efforts to reduce illegal residues on produce in cooperation with the Baja California:
    a. Analyze residue data to improve tracking procedures of produce shipments from Mexico found to contain illegal pesticide residues.
    b. Provide training to border region agricultural officials and growers on strategies that reduce pesticide drift and contamination.
2. Reduce VOC emissions from agricultural and commercial structural pesticides:
    a. Require formulation of high VOC containing pesticides.
    b. Facilitate research for viable VOC reduction strategies.

Mitigation of Environmental Hazards

Mitigation of environmental hazards is the process of developing strategies and proposals based on scientific data to reduce and lower the risks for pesticides that have unacceptable risks to the environment (including endangered species and phytotoxic residues) from contaminants in ground water, surface water, and air. As part of the mitigation development process, efforts are placed on obtaining and providing input on mitigation proposals from both internal and external stakeholders, responding to their comments, conducting a peer review of mitigation documents, and finalizing documents for release to the public.

Performance Goal 1: Mitigation Pesticides impacts on Groundwater.

1. Identify, evaluate and support mitigation measures for pesticides found in California ground water (including atrazine, simazine, bromacil, diuron, prometon, bentazon and norflurazon).
2. Produce a report outlining outreach efforts and recommendations for continued educational and potential regulatory options regarding chemigation.
3. Measure effectiveness of prevention and mitigation actions for use of 6800(a) listed pesticides in ground water protection areas, other statewide restricted pesticides, and chemigation educational activities.
4. Evaluate current backflow prevention regulations (6610) and propose regulations if necessary.

Performance Goal 2: Mitigate Pesticides' impacts on Surface Water.

1. Support the implementation of mitigation measures for two rice pesticides (molinate, thiobencarb) and five dormant spray pesticides (chlorpyrifos, diazinon, esfenvalerate, methidathion, and permethrin).
2. Identify and evaluate mitigation options for 2 pesticides adversely affecting the environment. (diazinon and chlorpyrifos) in cooperation with the San Francisco Regional Board.
3. Develop and implement mitigation measures for copper based antifouling paints.

Performance Goal 3: Non-Target and Endangered Species Protection.

1. Endangered Species:
    a. Support statewide permitting, use reporting & GIS by preparing to implement the PRESCRIBE application, maintenance of the Endangered Species Program Web site, and ongoing support for county bulletins.
    b. Disseminate information pertinent to court-ordered Pesticide Use Buffers for protection of Salmonids in California.
    c. Develop new or revised outreach material for 3 to 6 endangered species. New materials have been developed for four endangered species: California Tiger Salamander, Delta Green Ground Beetle, San Joaquin Wooly-threads, and Western Snowy Plover. In the coming six months we expect to develop artwork and information for 20 to 25 Endangered Plant Species.
    d. Translate existing applicator training materials for endangered species identification to Spanish. Translation of materials is ongoing. Over the past 6 months we have translated materials for 14 species. In the coming 6 months we expect to translate materials for 15 to 20 species. Twenty-thousand sets of Endangered Species cards in Spanish will be printed for distribution to counties, applicators and industry groups.
2. Develop and implement mitigation measures for rodenticides.

Pest Management Programs

Pest management programs include school Integrated Pest Management (IPM), agricultural and urban pest management projects on high priority pesticides, IPM innovator awards, technical/scientific resource services, and outreach to stakeholders.

Performance Goal 1: School IPM: Prevent children's exposure to pesticides by facilitating adoption of IPM in schools.

1. Conduct four planned SIPM workshops to instruct school district staff on techniques to control pests while reducing risks.
2. Conduct outreach & education (maintain Web site information, produce 3 interactive learning modules on pest and IPM, develop 2 pest fact sheets, publish a seasonal calendar of IPM activities and a poster, respond to approximately 250 inquires from schools and the public, and give approximately 6 seminars).
3. Develop a "pilot" training program for individual school districts.

Performance Goal 2: Promote Pollution Prevention.

1. Protect Water Quality: Prepare a summary report of Alliance Grant results and report on the IPM alternatives to watershed coalition groups; continue 2 grants

(PESP and FQPA) to educate growers on OP alternatives; model IPM/BMP combinations to determine which creates the largest theoretical reduction in pesticide runoff; assess economic and environmental measures associated with pheromone use on codling moths in walnuts; assist SWRCB, Regional Boards, and CalFed with grant funding programs (Prop. 40, 50, & 13, and 319 grants); and work with Urban groups on IPM projects.

2. Provide PUR Analyses and Technical IPM Information for DPR Priority Issues: (provide IPM expertise on VOC alternatives, Sales Database comparison to PUR, CAC exam questions, OP alternatives, fumigants, IR4, NRCS IPM standards, PUR reports, etc.).
3. Recommend IPM Innovator Award recipients and conduct award ceremony in October 2005.
4. Environmental Justice – analyze pest management trends. Staff have attended technical advisory and stakeholder meetings and prepared a draft project proposal and pesticide use information.
5. Technology: Identify technologies that reduce pesticide use and risk by October.

Enforcement

Enforcement activities include establishing statewide enforcement priorities, overseeing County Agricultural Commissioners' (CACs) pesticide use enforcement activities, and conducting investigations and taking enforcement action. Statewide enforcement guidance includes identifying priorities and developing a prioritization plan of performance objectives and strategies; negotiating enforcement work plans with each CAC; preparing an evaluation on the effectiveness of the county program; and consulting with CACs on the pesticide enforcement program, including investigations, researching and analyzing various compliance trends, and advising CACs of DPR policies, procedures, and developing issues. Enforcement activities include determining if an administrative civil penalty is required and sending a Notice of Proposed Action to a respondent; upon request, conducting a hearing with the respondent; preparing findings of fact, Notice of Final Decisions (NOFD), and Director's Order; signing Notice of Final Decision and Order; providing appeal procedures to the respondent; and levying a civil penalty if respondent's appeal does not lead to a reversal of the decision.

Performance Goal 1: Oversee the County Pesticide Use Enforcement Program.

1. Implement County Regulatory Oversight Program (CROP):
    a. Maintain and revise as necessary the CACs Performance Review process;
    b. Regional Office Supervisors will meet as necessary, annually at a minimum with CACs to review county program performance;
    c. Post county work plans and performance reviews on the DPR web site.

2. Administer County Oversight Inspection Program (COIP):
    a. Conduct "risk-based/neutral scheme" inspections statewide (375 inspections).

   b. Evaluate CAC's inspection programs using information gathered through the COIP and the Inspection Tracking Database; use "Citable Sections" to identify and focus on specific requirements.
   c. Focus on specific industry (growers, packing houses, commodity groups), chemical group (fumigants); equipment-use (sprinkler applications); work activity; research and evaluate improved processes for targeting oversight inspections.
   d. Compare DPR's oversight inspections and follow-up inspections to identify inspection program efficiencies and measure program progress.
   e. Conduct "Repeat Violator" inspections that rely on the Enforcement Action Database to identify repeat offenders.
3. Complaint and Interagency Referrals:
   a. Require each county to keep and maintain an investigations/compliant log available to DPR staff at all times.
   b. Maintain complaint logs and investigation/resolution of complaints (or referrals) necessary to ensure public confidence.
   c. Apply data obtained from complaint and referral logs to measure program progress in terms of performance and timely response.
   d. Apply data obtained from complaint and referral logs to identify specific training needs.

Performance Goal 2: Compliance Monitoring.

1. Develop "Risk-based" Focus Inspections including "repeat violators" in conjunction with the U.S.EPA Cooperative Agreement negotiations and conduct inspections as indicated:
   a. Pesticide Producing Establishment (60).
   b. Certified Applicators/Pesticide Dealers (10).
   c. Agricultural Use and Follow-up Inspections (150, 10 of which to be WPS label inspections at nurseries).
   d. Non-Agricultural Use and Follow-up Inspections (30)
   e. Miscellaneous (10).
   f. Worker Protection Standard "Tier I" (30)
   g. Product Samples (40).
2. Conduct 505 Product Compliance Inspections (130-federal, 375-state).
3. Improve quality of Pesticide Episode Investigations including human illness and environmental impacts with special emphasis on Priority Investigations to address the use of restricted materials that result in a priority episode.

Performance Goal 3: Enforcement Response.

1. Evaluate data to identify persons with repeat violations for possible State Actions.

2. Administrative Hearings Program – Complete outreach materials revisions (regulatory toolbox, Administrative Hearing Guides) for CAC staff and management acting as county advocates or hearing officers.
3. Provide Hearing Officer Services upon request.
4. Ensure new Enforcement Response Policy is implemented statewide.

Performance Goal 4: State & County Regulator Training.

1. Develop, implement, and facilitate the Liaison Internal Forum.
2. Develop a CAC "Train-the-Trainer" Program to improve training by DPR staff as follows:
    a. Structural Pest Control Enforcement
    b. Develop Restricted Materials Training – in conjunction with the revised Restricted Materials Manual;
    c. Pesticide Episode Investigation Procedures w/Worker Health & Safety Branch.

Performance Goal 5: Special Projects.

1. Develop and Implement Operational Standards:
    a. Continue development of "standards" or "operational procedures" for State and county pesticide regulatory staff for the Pesticide Use Enforcement Program as follows:
        i. Revise Laws and Regulations
        ii. Administrative Hearing
        iii. Restricted Materials
        iv. Pesticide Episode Investigation Procedures
    b. Prepare and complete the How To Comply Guidance for use by CACs when issuing permits or operator identification numbers (formerly Pesticide Information Safety Series A-6/N-6).
    c. Maintain Enforcement Action data quality, assess current business processes and use documents, and make necessary improvements for implementation.

Mill Assessment/Product Compliance

The focus of the mill assessment and product compliance program is to ensure products are registered prior to sales and use in California, that they are labeled correctly, and that the mill assessment fees have been paid. Mill assessment is a fee that California assesses on all pesticide sales, levied at the point of first sale into the State. A "mill" is equal to one-tenth of a cent. In 2004, this "mill assessment" equals 21 mills, or 2.1 cents per dollar of sales. Mill assessment revenues are placed in a special fund used to support the State's pesticide regulatory program. The mill assessment program is a self-assessment system. Each quarter, DPR mails reporting forms to pesticide registrants, licensed pest control dealers, and licensed pesticide brokers. Completed forms are due to DPR within 30 days of the end of the quarter. To ensure that products in the channels of trade are in

compliance with state pesticide laws and regulations, staff conduct inspections of products offered for sale, reviewing labels to ensure they are registered. DPR conducts audits of pesticide sellers to ensure they are paying sufficient assessments on their sales. Sellers in violation of product compliance and/or mill assessment requirements are subject to civil penalties.

Performance Goal 1: Collect the mill assessment on a quarterly basis from the 1,600 registrants, dealers, and brokers.

Performance Goal 2: Ensure responsible parties pay legally sufficient mill assessment on sales and distribution of pesticides into or within California.

1. Conduct 15 registrant audits.
2. Conduct 2 broker/dealer audits.
3. Conduct 8 audits of non-licensed entities.
4. Continue evaluating product movement in the channels of trade to determine the responsible party is paying mill assessment and access level of compliance.

Performance Goal 3: Ensure pesticide products sold into or within California are registered and labeled correctly.

1. Coordinate with the Enforcement Branch to conduct 505 product compliance inspections. (U.S. EPA Cooperative Agreement – 130/State Program – 375).
2. Coordinate, track and investigate 120 product related complaints.
3. Maintain and evaluate compliance history on company/firm(s) and products.
4. Develop policies and legislative or regulatory solutions to address inconsistencies and to promote equity within the regulated community.

Performance Goal 4: Pursue appropriate and consistent enforcement options and settlement agreements.

1. Pursue enforcement actions on 150-200 case of unregistered or misbranded products.
2. Post final dispositions for settlement agreements on external web site.

Performance Goal 5: Manage the disbursement of mill assessment funds to the county agricultural commissioners (CACs) on an annual basis.

1. Implement the new regulatory changes in the mill assessment distribution criteria.
2. Prepare quarterly mill assessment projections for CACs.

Performance Goal 6: Implement– Expansion of Brokers Licensing Program (AB 1011).

1. Coordinate issuance of licenses with PML Branch.
2. Incorporate new licenses into current mill assessment collection process.
3. Provide training and outreach to DPR's internal and external stakeholders.
4. Evaluate the current method of measuring and reporting compliance trends.